

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	
	§	
<b>HOUTEX BUILDERS, LLC, et al,</b>	§	<b>CASE NO. 18-34658</b>
	§	<b>(Chapter 11)</b>
<b>DEBTOR</b>	§	

**RESPONSE AND OBJECTION TO GREAT SOUTHWESTERN FINANCIAL  
CORP'S MOTION TO COMPEL CD HOMES LLC'S AND ROBERT PARKER'S  
RESPONSES TO REQUESTS FOR RECORDS AND DOCUMENTS**

TO THE HONORABLE JEFFREY P. NORMAN  
UNITED STATES BANKRUPTCY JUDGE:

Comes now, CD Homes, LLC and Robert Parker (the "Respondents") and file this Response and Objection to Great Southwestern Financial Corp's ("GSFC") Motion to Compel CD Homes LLC's and Robert Parker's Responses to Requests for Records and Documents (the "Motion"), and in support thereof, would respectfully show this Court as follows:

1. Respondents admit the allegations contained in Paragraph 1 of GSFC's Motion.
2. Respondents admit the allegations contained in Paragraph 2 of GSFC's Motion.
3. Respondents admit the allegations contained in Paragraph 3 of GSFC's Motion.
4. Respondents are without sufficient information to either admit or deny the allegations contained in Paragraph 4 of GSFC's Motion. Therefore, for pleading purposes those allegations are denied. However, for further answer, and based upon supplemental discovery produced to Debtors' counsel, CD Homes and Robert Parker have complied with all discovery requests of the Debtors and GSFC.
5. Respondents admit the allegations contained in Paragraph 5 of GSFC's Motion. For further answer, supplemental information has been supplied.

6. All responsive documents in CD Homes or Robert Parker's possession described in Paragraph 6 of GSFC's Motion have been produced.

7. All responsive documents in CD Homes or Robert Parker's possession described in Paragraph 7 of GSFC's Motion have been produced.

8. All responsive documents in CD Homes or Robert Parker's possession described in Paragraph 8 of GSFC's Motion have been produced.

9. WHEREFORE, PREMISES CONSIDERED, Respondents pray that GSFC's Motion be denied; and for such other and further relief to which Respondents may be justly entitled.

Dated: May 2, 2019

Respectfully submitted,

FUQUA & ASSOCIATES, PC

BY: /s/ Richard L. Fuqua  
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COUNSEL FOR CD HOMES, LLC

**CERTIFICATE OF CONFERENCE**

I hereby certify that I contacted Ross Spence, GSFC's counsel, by telephone in a good faith attempt to resolve the dispute which is the subject of GSFC's Motion. At this time, settlement is not possible, therefore, a hearing will be required.

/s/ Richard L. Fuqua  
Richard L. Fuqua

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Response was forwarded by ECF and/or regular United States mail, postage prepaid, on May 2, 2019 to the parties listed below.

Ross Spence  
Snow Spence Green LLP  
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Houston, TX 77019

Office of the U.S. Trustee  
515 Rusk, Suite 3516  
Houston, TX 77002

/s/ Richard L. Fuqua  
Richard L. Fuqua